

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

X

MATTHEW VANDERSLOOT,
individually and on behalf of all others
similarly situated,

Plaintiff,

-against-

CHARLES BARATTA LLC, D/B/A
PRIME MARKETING,

X

Defendant.

JOINT STATUS LETTER AND
AGREED BRIEFING SCHEDULE
2:24-cv-07096 (JMW)

Plaintiff, Matthew Vandersloot (“Plaintiff”) and Defendant, Charles Baratta LLC (“Baratta”), collectively (the “Parties”) submit this Joint Status Letter pursuant to the Court’s December 17, 2024 Order. On January 3, 2025, the Parties conducted a meet and confer and participated in an initial Rule 26(f) conference. Fed. R. Civ. P. 26. By agreement, the Parties propose the following briefing schedule with respect to Baratta’s anticipated Federal Rule of Civil Procedure 12(b)(6) motion to dismiss:

- Defendant’s motion to dismiss will be filed by January 24, 2025
- Plaintiff’s opposition will be filed by February 14, 2025
- Defendant’s reply will be filed by February 24, 2025

Accordingly, the Parties respectfully request that the Court adopt the above proposed briefing plan.

Dated: January 3, 2025

Respectfully submitted,

/s/ Andrew R. Perrong

Andrew R. Perrong (Appearing *Pro Hac Vice*)

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*Attorneys for Defendant Charles Baratta, LLC, d/b/a
Prime Marketing Source*

CERTIFICATE OF SERVICE

I hereby certify that on **January 3, 2025**, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ David M. Krueger

David M. Krueger